

*SC NAACP v. McMaster, et al*

Case No. 3:21-cv-03302-MBS-TJH-RMG

**EXHIBIT A**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

THE SOUTH CAROLINA  
STATE CONFERENCE OF  
THE NAACP, *et al.*,

Plaintiffs,

v.

THOMAS C.  
ALEXANDER, *et al.*,

Defendants.

Case No. 3:21-CV-03302-MBS-  
TJH-RMG

**PLAINTIFFS' NOTICE OF  
DEPOSITION OF WILL ROBERTS**

TO: All Counsel of Record

**PLEASE TAKE NOTICE** that, pursuant to Federal Rule of Civil Procedure 30, Plaintiffs, by and through their counsel, will take the deposition by oral examination of **Will Roberts at June 30<sup>th</sup> beginning at 9:30 am**. This deposition will be conducted **remotely using audio-visual conference technology**. Counsel will be provided with a Zoom videoconference link prior to the deposition. The deposition will be recorded by stenographic means before a person authorized to administer oaths pursuant to the Federal Rules of Civil Procedure, and shall continue from day to day until concluded. The deposition is taken for pre-trial discovery, for use at trial, and for such other and further purposes as permitted by law.

Dated: June 13, 2022

Leah C. Aden\*\*  
Stuart Naifeh\*\*  
Raymond Audain\*\*  
John S. Cusick\*\*  
NAACP LEGAL DEFENSE &  
EDUCATIONAL FUND, INC.  
40 Rector St, 5th Fl.  
NY, NY 10006  
Tel.: (212) 965-7715  
laden@naacpldf.org

Santino Coleman, Fed. ID. 11914  
Antonio L. Ingram II\*\*  
NAACP LEGAL DEFENSE &  
EDUCATIONAL FUND, INC.  
700 14th St, Ste. 600  
Washington, D.C. 20005  
Tel.: (202) 682-1300  
aingram@naacpldf.org

Adriel I. Cepeda Derieux\*\*  
Samantha Osaki\*\*  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
125 Broad Street, 18th Floor  
New York, NY 10004  
Tel.: (212) 549-2500  
acepedaderieux@aclu.org

John A. Freedman\*\*  
Elisabeth S. Theodore\*  
Gina M. Colarusso\*\*  
John M. Hindley\*\*  
ARNOLD & PORTER KAYE SCHOLER  
LLP  
601 Massachusetts Ave., N.W.  
Washington, D.C. 20001  
Tel: (202) 942-5000  
john.freedman@arnoldporter.com

*\* Motion for admission Pro Hac Vice  
forthcoming*  
*\*\* Admitted Pro Hac Vice*

Janette M. Louard\*  
Anthony P. Ashton\*  
Anna Kathryn Barnes\*\*  
NAACP OFFICE OF THE GENERAL  
COUNSEL  
4805 Mount Hope Drive  
Baltimore, MD 21215

Respectfully submitted,

/s/ Allen Chaney  
Allen Chaney, Fed. ID 13181  
AMERICAN CIVIL LIBERTIES UNION  
OF SOUTH CAROLINA  
Charleston, SC 29413-0998  
Tel.: (843) 282-7953  
Fax: (843) 720-1428  
achaney@aclusc.org

Christopher J. Bryant, Fed. ID 12538  
BOROUGHES BRYANT, LLC  
1122 Lady St., Ste. 208  
Columbia, SC 29201  
Tel.: (843) 779-5444  
chris@boroughsbryant.com

Somil B. Trivedi\*\*  
Patricia Yan\*\*  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
915 15th St., NW  
Washington, DC 20005  
Tel.: (202) 457-0800  
strivedi@aclu.org

Jeffrey A. Fuisz\*\*  
Paula Ramer\*\*  
Andrew Hirschel\*  
ARNOLD & PORTER KAYE SCHOLER LLP  
250 West 55th Street  
New York, NY 10019  
Tel: (212) 836-8000  
jeffrey.fuisz@arnoldporter.com

Sarah Gryll\*\*  
ARNOLD & PORTER KAYE SCHOLER LLP  
70 West Madison Street, Suite 4200  
Chicago, IL 60602-4231  
Tel: (312) 583-2300  
sarah.gryll@arnoldporter.com

*Counsel for Plaintiffs the South Carolina  
Conference of the NAACP and Taiwan Scott*

Tel: (410) 580-5777  
jlouard@naacpnet.org

\* Motion for admission *Pro Hac Vice*  
forthcoming or pending  
\*\* Admitted *Pro Hac Vice*

*Counsel for Plaintiff the South Carolina  
Conference of the NAACP*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 13, 2022, a true and correct copy of the foregoing was served on all counsel of record by electronic mail.

/s/ Allen Chaney

Allen Chaney, Fed. ID 13181  
AMERICAN CIVIL LIBERTIES UNION  
OF SOUTH CAROLINA  
Charleston, SC 29413-0998  
Tel.: (843) 282-7953  
Fax: (843) 720-1428  
achaney@aclusc.org